

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER WALLACE

Criminal No. 15-56

GOVERNMENT'S SUPPLEMENTAL SENTENCING MEMORANDUM

AND NOW comes the United States of America, by its attorneys, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Cindy Chung, Assistant United States Attorney for said district, and respectfully files its supplemental sentencing memorandum.

On November 14, 2016, the government submitted a sentencing memorandum which discussed its restitution and forfeiture estimates. Accordingly, the government contacted its case agent to determine where the recovered funds were located for future forfeiture purposes. In doing so, the government learned that while law enforcement estimate that approximately \$1500 was recovered from Jefferson Road on the date of the robberies, much of this currency was damaged beyond redemption due to the dye-pack explosion. Therefore, only a portion of the funds recovered from Jefferson Road are available for forfeiture. The salvageable amount, combined with the currency recovered from the defendant's person on February 11, 2015, amounts to a total of \$382. The Government thus submits that judgment should be entered ordering restitution in the amount of \$9,444.00, and forfeiture in the amount of \$382 (which amount shall be applied towards restitution).

Wherefore, the Government respectfully submits its supplemental sentencing memorandum.

Respectfully submitted,
DAVID J. HICKTON
United States Attorney

By: /s/ Cindy Chung
CINDY CHUNG
Assistant U.S. Attorney
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